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8 **UNITED STATES DISTRICT COURT**
9 **WESTERN DISTRICT OF WASHINGTON**
10 **TACOMA DIVISION**

11 WILL CO. LTD. a limited liability company
12 organized under the laws of Japan,

13 Plaintiff,

14 vs.

15 DOES 1-20, d/b/a THISAV.COM,

16 Defendants.

Case No.: 3:20-cv-05802-BHS

**DECLARATION OF SPENCER
FREEMAN IN SUPPORT OF
PLAINTIFF'S *EX PARTE* MOTION
FOR EARLY DISCOVERY**

NOTE ON MOTION CALENDAR:
September 10, 2020

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18 I, Spencer Freeman, under penalty of perjury, declare and state as follows:

19 1. I am an attorney at law licensed to practice before the Courts of the State of
20 Washington, the United States District Court Western District of Washington, Eastern District of
21 Washington, Ninth Circuit Court of Appeals, and United States Supreme Court. I am the
22 principle attorney with the Freeman Law Firm, Inc., attorneys for Plaintiff Will Co. Ltd. Unless
23 otherwise stated, I have personal knowledge of the facts contained herein this declaration and, if
24 called and sworn as a witness, could and would competently testify thereto.

25 2. In previous litigation, I have had direct contact with the following regarding
26 production of information without a subpoena: GoDaddy.com, LLC; Domains By Proxy;

Cloudflare, Inc.; PayPal, Inc.; and Tiger Media, Inc. Each of these entities clearly previously
DECLARATION OF SPENCER FREEMAN IN
SUPPORT OF PLAINTIFF'S *EX PARTE* MOTION FOR
EARLY DISCOVERY
[3:20-cv-05802-BHS]

FREEMAN LAW FIRM, INC.

1107 ½ Tacoma Avenue South

Tacoma, WA 98042

(253) 383-4500 - (253) 383-4501 (fax)

1 indicated that they would comply with a lawful subpoena (and have done so), but they could not
2 produce any information without a subpoena.

3
4 I declare under the penalty of perjury under the laws of the United States of America that
5 the foregoing is true and correct.

6
7 Execute on the 10th day of September 2020 at Tacoma, Washington.

8
9 /s/ Spencer D. Freeman
10 Spencer Freeman